

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

**U.S. SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**WYNN A.D. CHARLEBOIS and
WC PRIVATE LLC,**

Defendants.

Civil Action No. _____

**PLAINTIFF'S EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER,
ASSET FREEZE, AND FOR OTHER EQUITABLE RELIEF**

The U.S. Securities and Exchange Commission ("Plaintiff" or the "Commission") seeks an emergency order (1) temporarily restraining Wynn A.D. Charlebois ("Charlebois") and his alter ego entity, WC Private LLC ("WC Private") (collectively, the "Defendants"), from violating the antifraud provisions of the federal securities laws; (2) freezing the assets of Charlebois and WC Private; (3) expediting discovery in this proceeding; (4) prohibiting Charlebois and WC Private from destroying, altering or removing assets; and (5) ordering an accounting. As grounds for this motion, the Commission offers the following:

Charlebois and WC Private have actively and aggressively perpetrated a multi-million dollar Ponzi scheme from at least February 2019 to the present. During this time, the Defendants routinely obtained significant amounts of money from new investors under false pretenses, and used it to pay previous investors and to fund Charlebois' lavish lifestyle. Most recently,

Defendants' fraud has come in the form of fake offerings to participate in the exercise of stock options that Charlebois claims to own. From as early as November 2021 through the present, Charlebois raised at least \$350,000 through these bogus offerings. Charlebois never owned the options that he claimed, and bank records show that he used the funds to either repay prior investors or to fund his personal expenses. While the full number of the Defendants' victims and extent of their losses is presently unknown, they appear to be vast. The fraud is ongoing, with Defendants having solicited an investor as recently as April 2022.

Immediate action by this Court is necessary to halt this on-going fraud and to prevent the further dissipation and removal of investor assets.

Dated: May 19, 2022

Respectfully submitted,

/s/ Robert F. Schroeder

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